

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In re: Jerome L. Hodges Sr. * Case no 21-15613
* Chapter 13

Debtor(s). *

U.S. Bank Trust National Association
Movant,
vs.

Jerome L. Hodges Sr.

Debtor/Respondent,

* * * * *

RESPONSE TO MOTION FOR RELIEF FROM STAY TO RECLAIM SECURITY

Now comes the Debtor (the “Respondent”), through attorney, Jeffrey M. Sirody, and responds to the *Motion For Relief From Stay to Reclaim Security* as follows:

- 1) The Debtor admits the allegations contained in Paragraphs 1 through 7 of the Motion.
- 2) The Debtor denies the allegations contained in Paragraph 8 through 14 of the Motion.

WHEREFORE, the Debtor requests that the Court deny the Motion.

/s/ Jeffrey M. Sirody
Jeffrey M. Sirody, Bar ID # 11715
Jeffrey M. Sirody & Associates
1777 Reisterstown Road, Suite 360 E
Baltimore, MD 21208
(410) 415-0445
Attorney for Debtor/Respondent

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this, the 3rd day of January, 2023 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing *Response to Motion For Relief From Stay to Reclaim Security* will be served electronically by the Court's CM/ECF system to the following:

Rachel M Kiefer rkiefer@ecf.courtdrive.com, bankruptcy@friedmanvartolo.com

Andrew Leonard Spivack andrew.spivack@brockandscott.com, wbecf@brockandscott.com

Brian A. Tucci ECF@ch13balt.com,
btucci13@ecf.epiqsystems.com;trusteemdb41@ecf.epiqsystems.com

/s/
Jeffrey M. Sirody, Esquire